

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

STEPHEN D. CAIAZZO,	*	CIVIL ACTION NO. 04CV 12627
	*	
	*	
Plaintiff,	*	
v.	*	
	*	
THE MEDALLION INSURANCE	*	
AGENCIES, INC.,	*	
Defendant.	*	
	*	

ASSENTED TO MOTION TO EXTEND SCHEDULING ORDER DEADLINES

NOW COMES the defendant, The Medallion Insurance Agencies, Inc., in the above-captioned matter and moves that this Honorable Court extend the scheduling order deadlines.

In support of this motion, the defendant states as follows:

1. This is a complicated matter involving three separate and distinct claims of the plaintiff against the defendant.
2. The defendant's discovery motion to conduct a further deposition of Thomas Collins, plaintiff's former attorney, was allowed in part on October 17, 2005.
3. The deposition was scheduled for November 11, 2005.
4. Counsel for Attorney Collins is no longer available on November 11, 2005.
5. The defendant would like to extend the scheduling order deadlines in order to complete discovery in this matter, including the deposition of Attorney Collins, as ordered by the Court.
6. Allowance of this motion will serve the interests of justice and judicial economy, insofar as no party will be prejudiced, and by allowing the parties to obtain information which they

reasonably require to prepare for trial, and to narrow the areas of dispute for trial.

7. The plaintiff assented to this motion.

WHEREFORE, the defendant respectfully requests that the scheduling order be amended as follows:

- a) Discovery due by 1/31/06;
- b) Motions due by 3/3/06;
- c) Response due by 4/3/06 (or 30 days after the motion is filed);
- d) Plaintiff to disclose experts by 3/30/06; and
- e) Defendant to disclose experts by 4/15/06.

THE MEDALLION INSURANCE AGENCIES, INC.
By its attorneys,

/s/ Kerry D. Florio
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ASSENTED TO:

/s/ Dean Carnahan
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Dated: November 3, 2005